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Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re GROUPON MARKETING AND
SALES PRACTICES LITIGATION

No. 3:11-md-02238-DMS-RBB

NOTICE AND DECLARATION OF
TERMINATION OF SETTLEMENT
AGREEMENT

Judge: Hon. Dana M. Sabraw

1 I, Shirli Fabbri Weiss, declare:

2 1. I am an attorney licensed to practice law in California and admitted to
3 practice before this Honorable Court, and am a partner in the law firm of DLA
4 Piper LLP (US), attorneys of record for Defendants in the above-captioned action,
5 including Groupon, Inc. ("Groupon"). I have personal knowledge of the matters
6 set forth in this Declaration.

7 2. Pursuant to Section N.1.(c) of the parties' Amended Stipulation of
8 Settlement ("Settlement Agreement") (Dkt. 98-1 at § N.1.(c)) and the Court's April
9 9, 2015 Order granting the parties' stipulation to extend certain deadlines set forth
10 in the Settlement Agreement (Dkt. 145), Defendant Groupon gives notice to this
11 Honorable Court and all Parties that it terminates the Settlement Agreement.

12 3. Attached hereto as Exhibit A is a true and correct copy of the
13 termination letter served upon Class Counsel in accordance with the terms of the
14 Settlement Agreement.

15 4. Groupon shall request the Claims Administrator to post information
16 regarding the termination on the Settlement Website and to e-mail such
17 information to those Settlement Class Members who provided an e-mail address to
18 the Claims Administrator.

19 I declare under penalty of perjury under the laws of the State of California
20 and of the United States of America that the foregoing is true and correct.

21 Executed on June 22, 2015, in San Diego, California.

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23 
24 SHIRLI FABBRI WEISS